

ATTACHMENT I

Possible Cost Impacts on the Department of Defense's Cleanup Program from Inability to Waive ARARs

The following examples present information on waivers of requirements at installations because of technical impracticability, and cost impacts ranging from \$200,000 to \$22.1 million if the Department of Defense were unable waive the requirements.

Installation	Sites Requiring Waiver/Total Sites	Waiver Requested	ARAR Description	Impacts if Waiver Denied
Edwards AFB	248 of 248 sites	Waiver of state MCL for GW contamination	Technical impracticability	Double cost of program from \$200K to \$400K
Air Force Plant 44	1 of 13 sites	Waiver of state MCL for GW contamination	Technical impracticability	Require operation of water treatment plant for 30 years instead of 10 years; \$10.5M
Pope AFB	4 of 17 sites	Waiver of state MCL for GW contamination	Technical impracticability	\$1.3M and 1 year cleanup delay
Hill AFB	7 of 105 sites	Waiver of state MCL for GW contamination	Technical impracticability	\$22.1M

Note: MCL = maximum contaminant level; GW = groundwater.

As shown in the examples presented above, costs would increase by \$34.4 million at these 260 sites if DoD, as the lead agency, could no longer waive applicable requirements. If DoD lost its ability to waive requirements, pursuant to the criteria in S. 8, at any of DoD's 15,189 sites that have not reached response complete, the cost of cleanup would increase. For example, if waivers at 1 percent of DoD's 15,189 sites would have resulted in cost savings of \$200,000 per site, additional costs to DoD could reach \$30.4 million if these waivers were denied. Denied waivers at 5 percent of sites could yield cost increases of \$152 million.